

Adamczyk

S.D. Federal Court of Illinois

United States District Court

22-863-SMY

Southern District of Illinois

Lawrence Adamczyk (class action) Civil Action

Plaintiff

No.

vs.

Complaint

- Illinois Department of Corrections IDOC
- Rob Jeffries Director of IDOC
- Richard Mogenstuhler Warden of BMCC
- Administrators and Staff at IDOC Headquarters responsible for policy and decision making of wards at the State of Illinois
- Administrators and all staff at BMCC
- Staff working under School District 428 at BMCC and their Administrator in Springfield
- Wexford Health Sources Inc.
- All Wexford staff at BMCC

All named in both individually and official capacity.

Defendants

I Jurisdiction and Venue

1. This is a civil action authorized under 18 § 1595 to redress violations for Slavery / Involuntary Servitude ~~off~~ from any of the common tort claims of 18 § 1584, 18 § 1589, 18 § 1590 (a)(b), 18 § 1592 (a)(c), 18 § 1593(A) or/and 18 § 2411, And Trafficking Victims Protection Act § 701, TVPA 22 § 7101 et seq., 18 § 1581 Perjury, 18 § 1951 Racketeering.

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I Jurisdiction and Venue

- 2.) Part of this civil Action authorized under 42 § 2000(e)
42 § 2000(d), 42 § 2000 a-6, 42 § 2000(e),
42 § 2000, 42 § 2000 d-7 And executive Orders
No 13160 that expanded coverage to Disability and
more to redress equal access to the commissary for
A non Insolvent Servitude committed person,
Access to public education, And rights of
Employment Discrimination under 48 § 2000d, 29 § 101,
29 § 201, 42 § 12111, 42 § 12112 Discrimination, 42 § 12131
42 § 1983, 42 § 1984, 42 § 1985¹²³¹², 42 § 1985(2)(3)
3. This Court has jurisdiction UNDER 28 U.S.C Section
1331 And 1333(a)(3) . Plaintiff seeks Declaratory
Relief pursuant to 28 U.S.C. ~~2201~~ section 2201 and 2202.
Plaintiff(s) claims for injunctive relief are
Authorized by 28 U.S.C. 2283 And 2284 And
Rule 65 of the Federal Rules of Civil Procedure.
4. The Southern District of Illinois is An appropriate
Venue under 28 U.S.C. Section 1331(b)(2) because
it is where the events giving ~~rise~~ to this
claim occurred. Furthermore, the Complaint holds
“Class Action Allegations”

II Plaintiffs

5. Plaintiff Lawrence Adameczik And class of Plaintiff were
At All times herein A WARD of STATE in the Guardianship

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II Plaintiffs (continued)

- b. of IDOC. Plaintiff is confined at Big Muddy River Correction Center BMACC

III Defendants

7. IDOC is the State Agency Given Correct Guardianship per Section 3 of the Sexually Dangerous Person Act, SDPA, 725 ILCS 2/55, but address transferring to any State Agency At WOS.
8. Wexford Health Source Inc. is the medical contracted private corporation responsible for it employees At BMACC Action thru policies of their And Respondent Supervisor And with IDOC Policies
9. Rob Jeffries Director of IDOC. He is legally responsible for making policies, seeing they get implemented and having a facility set aside ~~At BMACC~~ for the Wards of the State in his Guardianship.
10. Richard Margenthaler Warden At BMACC, He is legally responsible for the operation At BMACC And the Wards of the State, WOS, ~~and~~ ~~DO NOT make sure~~ ^{Wards} are not treated like Insolvent Servitude convicts thru Discretionary policies of IDOC. AS "Head" Guardian on Site that UTMOST CARE And

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III Defendants continued

UTMOST Treatment is given the W of S. He
is responsible for set aside facilities by Direct policy allowing

11. Other Administrators And All other Staff have
A part in carrying out proper care, treatment,
safe keeping of W of S in their Duties to
make sure they are NOT subjected to Any
Involuntary servitude threatening, scheme designed
policies in Use At Bmacc for the convicted.
They all have a fiduciary Statutory Duty to
Act on behalf of the W of S by reporting Any
Neglect acts of Staff towards A WARD of
the State to the Administrative Court, and
other State Agencies, like police.

12. Administrators And Staff at INOC Also own A
duty in fulfilling their Job Duties to Bmacc
to the W of S their by statutory fiduciary
owning the Utmost care in material to
the Public and All other Staff and creating policies for W of S

13. Wexford Staff all employed working At Bmacc
own A Higher standard to W of S At Bmacc
to their medical Health care needs because of
the imprisonment of the plaintiffs ^{where} ~~and~~ W of S

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III Defendants (continued)

13 (A) Wexford Health Care Scores Inc.

AS Respondent Supervisor And /or Policy maker
to their Staff AND A Corporation AS An Entity
itself NEED to Recquire the Big Difference
of an institutionalized patient And W of S
At Once By Policy Directive. The SOA Law
As well As Federal Laws Require Affirmative
Duties Placed on Healthcare Corporations that
end suffering and pain of Institutionalized
persons who are NOT Industry Servicals
Chattel reduce rights persons.

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III Defendants (continued)

13. cont' mental illness or developmental Disability needs, As Court Adjudicated need, knowing they Are NOT sentenced Metting Farsighted Services Chittel assault level of medical care is NOT allowed, AS medical staff they have the Utmost cause to relieve the pain and suffering AS quickly as possible for A W of S. Individually and by policy should report neglect to proper care that can lead to Health issues. like lacking of clothing and proper shelter.
14. The School staff at BMZCC and persons in charge at Springfield for IVAE "school District 428" Have a Statutory Fiduciary Duty to the Plaintiff and all wards of the state at amce to getting a public education to the highest level they desire, can achieve. For some wards this would entitl Special educational classes to graduate school of elementary or secondary; others getting them into fiscially and program ~~the~~^{PAGE} post-secondary Public Higher institutions in Illinois. This also includes Access to the Law Library / Library. The statute mandates A Facility set aside for the Adjudicated mental handicapped. That include word processors for their use among other things. Also Pens not Seg Pens.

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III Defendants (continued)

15. Each defendant is sued individually and in their official capacity. At all times in this Complaint each defendant is presumed to know the laws. And while some claims are based off constitutional law violations that may be seen as acting under the color of the law. The proper different legal theory is ~~is~~ Acted by Abusing the law Applies to All Defendants - to the torts of 18 & criminal violations especially.
16. The Jurisdictional civil actions And Defendants Abuse of the law(s) is by Virtue of the 13th Amendment incorporation of the 1st Amendment And 9th Amendment to liberty And rights of each. OR also virtue of the 1st Amendment and 9th Amendment. This sentence may be better placed in the Fact section or legal claims

IV Facts (A) To All claims

17. IDOC's BMZCC facility design by Building living spaces (Physical and Policies of TDCI's defined "Facilities" are done To hold its convicted felons of the State Courts to Involuntary Servitude As punishment After A Only criminal conviction Allowed by the 13th Amendment. Almost all basic rights, human rights, Civil rights, certain rights Are either denied or destroyed

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IV Facts (A) To all claims (continued)

by arbitrary policies and arbitrarily discretion (use of them to classify a convicted person into it "state" For Wots this is illegal

18. WARDs of the state, Lawrence Adamczyk, the plaintiffs Are NOT criminally convicted, but instead Upon the doctrine of Parva Patriae, civilly committed NOT AS sentenced criminal felons but statutory fiduciary WARDs of the state at BMRC.
19. WARDs of the state under the SDPA all have been adjudicated by the Administrative Circuit Court to have an mental illness And/or mental developmental disability
20. Section 8 of SDPA puts The WARD of the State into ILL's guardianship noting the facility must ~~not~~ be set aside for the proper safe keeping And to effect recovery the proper care Along with the proper treatment must be given to an utmost.
21. While the SDPA is INVALID AND UNCONSTITUTIONAL, This lawsuit is About the Defendants wrongs, injuries, pain And suffering Against Mentally ill And/or Developmentally Disabilty Wots at BMRC.

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IV Facts (A) to all claims (continued)

22. There are over 1400 criminally convicted held for Slavery / Insolent Servitude punishment at BMRCC
23. There are around 150 Wots, known as 50's by word of mouth, at BMRCC, who are civilly placed
24. Both numbers change for convicts they have adoptions, transfers, Natural Deaths or Slave enhanced Death at IND. The Wots have an occasional release by Courts, Natural Deaths and The illegal Insolent Scheme (Policies) that lead to unnecessary deaths at BMRCC. One choice to death on Bread while Warden and Indx staff were present.
25. These deaths occurred because of the insolent Servitude policies of celling as opposed to "rooming" And choking to death because of slave like rules to bringing dietary food back to your cell. Both Warden, Indx, and Staff at Big Muddy each contributed to the Deaths of Billy Y. Mark Turner, and Thomas Harker

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II Facts (A) to All claims (Continued)

26. While Around 1400 convicts exist And 150 WotsS exist at BMFCC, All Are forced to live in A Involuntary Servitude Cell designed for Long term punishment. Having less than 24 square feet of movement space (walking type) And toilets will be held less than 2 feet from primitive designed Beds.
27. Both the WotsS and convicted persons get the "Bare minimum clothing Allowed by a mixture society at this time" NO T-shirts, NO Rain proof clothing, NO gym shoes to Play Recreational, NO winter Coats, ONLY 3 boxer shorts for a year, Only 2 pairs of Socks for a year, NO Sun shading hat, NO winter Gloves, NO sweat top or bottom, NO Gym shorts, NO winter hat Some of this things ARE Allowed to be purchased off the Monopoly Pen Commissary, But NO winter coats, gloves, shirts Are ever sold. NOR Any Rain Raincoats Clothing for the weather.
28. The next set of facts will be used about Convicted felons at BMFCC, the WotsS at BMFCC, other types of detainees And facts about Involuntary Servitude

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IV Facts (continued)

The allowed currently legal by way of the 13th Amendment And TVPA Trafficking Victims Protection Act of 2000 that has Statutory Congressional facts made toward Involuntary Servitude.

I will quote from TVPA § 7101 et seq. to draw Cf to convict in Involuntary, Wots who are NOT suppose to be in it. And the Security Arbitrary reasons used for even Pre-trial Criminal Detainees. This is done to compare & contrast (Cf) the facts. Quotes from TVPA may to Cf put in gaps to the whole Quoter And replace with [Wots] in parts of it. to show the factual truth of what is occurring

29. State pay for Unassigned And Job Assignment for Cen Attnance And Wots are the SAME Involuntary ~~Uninformed~~ servile pay ranging from \$13 A month to \$35 A month At BMREC
30. But currently Wots get discriminated for higher paying Job Assignments arbitrary based on their mental illness And or developmental disability And mental disorder status
31. BMREC receives Federal money some grant And State money of over \$34,000 A year to proper

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IV Facts (continued)

Care and rehabilitative treatment and to
safely keep

32.) The Job Assignments Are essential to BMCC running. They include law library clerks, dietary, Janitors, maintenance of building and outside area, Live-in Aids, Garbage collection to name some. All these q. Jobs should be offered to willing and able Wots to employment not as no offer or then or as only having paying Industrial Servitude state pay of a convict.

33. TVPA § 7102 Definitions (1)(B) ~~Severe~~ Severe forms of Trafficking in Persons, the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through ... for the purpose of subjecting to involuntary servitude, peonage, debt bondage or slavery.

34. To Above ~~American~~ Convicts at BMCC get this okay condition because of the 13th Amendment allowing it as punishment of a person to be chattled as human property service of getting Federal and State money while paying out State pay A) An Slave (f. Wots this is

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IV Facts (continued)

illegal, Abuse of the Law, false imprisonment [not legal detention] because it is done as a involuntary servitude chattel person is being diminished to only property status, including state not as an employee.

35. Statutory fact to support above fact for WofS NOT convicted persons at BMRECC
TUPA § 7101 (b) Findings (10) notes "Trafficking also involves violations of other laws including labor ... And laws against ... slavery, ... false imprisonment, ... And extortion."

36. Statutory fact about the Facility commissary at BMRECC towards WofS support the extortion laws (tort) being broke and TUPA § 7101 (b) Findings (12) "Trafficking in Persons Substantially Affects interstate and foreign commerce: Trafficking for such purposes as involuntary servitude, peonage, and other forms of forced labor has an impact on the nationwide employment network and labor market. Within the context of slavery, servitude, and labor or services which are obtained or maintained through coercive conduct that amounts to a

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IV Facts (continued)

Condition of servitude victims are subjected to a range of violations...

37. Again for Cf IDOC's BMSCC contains criminally convicted chattel humans being property allowed to be subjected to Slavery / Involuntary Servitude AS punishment And Wots who are NOT suppose to be part of that Group IDOC's And BMSCC policies support TVPA § T101 findings (b) (12) above AS does the below facts towards Wots being Victims AS Does John Howard report (All exhibits.)

38. ILCS, Illinois Criminal Law and Procedure, 730 ILCS 5/3-7-2a is Corrections (meaning) IDOC Article 7 facilities Commissaries is 5/3 - 7-2a Allows convicts and Wots illegally to be extorted to pay for hygiene and extra food, medical medicine needs, and mental Health things and clothing. For example toothbrushes, toothpicks (quality), dental Floss, socks, undershirt, BE T-Shirt, gym shorts, sweat tops and Bottoms, the SOAR policies have changed, shower shoes, Extra nutritional food because IDOC BMSCC does not allow an inmate to openly bring food back from dietary

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IV Facts (continued)

unless arbitrary discretion of staff by giving them a tray. No form of Turnover is used to save food for proper consumption later for health reasons. (more facts later)

40. Under 730 ILCS 5/3-8 Adult Institutional Procedures used for both the committed犯人 property convicts and Wots at BMSCC 5/3-8-3 Program Assignment
(a) Work, education and other program assignments shall be made is so far as practicable in accordance with the Social evaluation.
(b) The Director shall establish procedures for making and reviewing program assignments.

41. Cf for Wots and convicts at IDOC "BMSCC They are treated the same to these terms, but (Should not be;) 730 ILCS 5/3-1 Definitions 5/3-1-1 "meanings of words and Phrases"
... have the meanings designated in this Article except when a particular context clearly requires A different meaning. 5/3-1-2 Definitions (c)
... however a committed person shall NOT be considered to be an Employee of the Dept for Any

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IV Facts

Purpose, including eligibility for a pension, benefits, or any OTHER compensation or Rights or privileges which may be provided to employees of the Department. This (c) is the defining of Slave / Involuntary Servitude to State Pay for IND's BMCC "connected person back CIVIL WOTS & Illegally done And Criminal. SDPA mandates A different meaning for employee

42. Cf to contrast facilities for the Adjudicated Under Mental Health and Developmental Disabilities
405 ILCS 5/1-129 defines Mentally Illness ...
"means A Mental or emotional disorder ... OR Abnormally manifested Only by repeated criminal or otherwise Antisocial conduct."
405 ILCS 5/2-100 Article I Rights (a) "No Recipient of Services shall be deprived of my rights, benefits, or privileges GUARANTEED by LAW , the Constitution ...
405 ILCS 5/2-106 Labor sections state the wage and employment Acts apply And Fair minimum wage must apply to the mentally ill or mentally Developmental disability.

43. Cf the last 10-12 stated facts . The 13th Amendment Allows Slavery / Involuntary Servitude AS

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IV Facts

43. Punishment after Only A Only conviction
 cont. TVPA findings Note All the Harm caused
 by Industry Services to the Person
 And to the welfare of the Public see fact 36
 About TVPA. AND NOTE The Purpose Stated
 in the 2000 year law was part of TVPA
 § 7101 (a) purpose ... are to combat trafficking
 in persons, A contemporary manifestation of
 Slavery. Under Congressional Finding in 2000
 (4) "Trafficking in persons Also occurs within
 the borders of A Country, including the
 United States." [Wots at BMACC] should
 be added to this As to the Finding section
 of 2003 (1) Trafficking in Persons continues
 to victimize [mentally ill Wots at BMACC]
 countless men ... in the United States ..." Under Findings (b) of 2000 (4) Traffickers
 Primary target [Wots at BMACC mentally ill]
 who are Disproportionately Affected by
 Poverty, lack of access to education,
 chronic unemployment, discrimination, And
 lack of economic Opportunities in Countries
 of origin ... (5) goes on to state what
 FDOC policies mostly do All the time.
 "Traffickers often transport Victims [Wots]

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II Facts

4(a) cat. from their home communities to unfamiliar destinations ... away from Family and Friends
... And other sources of protection and support,
leaving the victims defenseless and vulnerable."

4(b) TUPA for Wards at Bmcrc finding (7)
Traffickers often make representations to their victims that physical harm may occur to them
... should they attempt to escape..."

IDP policy and Bmcrc is to shoot the person charged convict or Wards who is a Non-criminal Under the SOA. Bmcrc does nothing to physically identify one group from the other.

These next set of facts further explain the statutory difference between the WARDS of the state at Bmcrc and the convicts.

4(c) Section 8 of the SDAA is clear on A SET ASIDE Facility done with the UTMOST relationship of Guardianship - WARD (see Attachment exhibit Cf with the Criminal Code to Corrections)

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IV Facts

45. Cf "Imprisonment" 730 ILCS 5/5-1-10 means "incarceration in a correctional institution under a sentence of imprisonment."
46. Convicted persons in custody are "sentence" 5/5-1-19 is "the disposition imposed by the court on a convicted defendant."
47. 730 ILCS 5/5-1-5 "conviction" means "A judgment of conviction or sentence entered upon a plea of guilty or upon a verdict or finding of guilty of an offense ..."
48. 730 ILCS 5/5-1-15 itself means "any term for which a sentence to a term of imprisonment ... is provided by law of this state ..."
50. So as to the 13th Amendment Illinois defines how it punishes Corrections Department Are set-up for those to be chattel Involuntary Servitude for incarceration to facilities And policies of Imprisonment. The convicted person is ~~in~~ custody. And both 730 ILCS 5/5-1-1 meanings of words and phrases and 730 ILCS 5/3-1-1 meanings of words and phrases have

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IV Facts

50. cont. the exact same definitions which notes
view the context of applying, then must
be different.

51. The Wards of the State is exactly one of
those requiring a different meaning to then
their regular Involuntary Servitude committed
person. Section 8 of the SOPA mandates it.

52. The terms employee, employment have the
traditional meaning that should apply for
the W of S. They are not sentenced because
of a conviction, a finding of guilt of an
offense in a court, after a trial for that matter.
Cf ss while 735 ILCS 5/3-1-2 (c) lack of
employee status for a convict A ward of state
does not lose the employee true meaning.

53. 730 ILCS 5/3-2-3 (b) speaks to the Director
of DOB duty to establish Divisions within
the Department ... by laws of their state.
The SOPA explicitly requires a Division like
the Women's Division or Juvenile Division.
The WODS Guardians-WARD An SET ASIDE
facility carry that meaning.

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IV Facts

54. Under 730 ILCS 5/3-2-2 Powers and Duties of the Department (1)(d) "To develop and maintain programs of control, rehabilitation, and Employment of committed persons within its institutions

55. Cf for its Inventory Service consults they have service / Latin State pay for Unassigned And Job Assignments.
For the Wots they have None other than the same Inventory Service State Pay does under Scheme and correction.

56 Under 730 ILCS 5/3 2.5-20 (a) (3) The Director is to identify the need for and recommend the funding for Joliette programs Cf with what should be occurring for Wots under SDOT section 8

57 Under 730 ILCS 5/3-6-2 "... A Chief Administrative Officer [Warden] shall be responsible for all persons assigned to the Institution or Facility ... shall administer the programs of the Department for the custody and TREATMENT of such persons."

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IV Facts

58. Under 730 ILCS 5/3-6-2(b) "The CAO [wards] shall have such assistants as the Department may assign."

59. Under 730 ILCS 5/3-6-1(b) "The types, number and population of institutions and ~~* Facilities *~~ shall be determined by the needs of committed persons for treatment and the public for protection." It is clear that the SDPA section mandates a different type of facility for its wards under a guardianship than the Inventory Service. Imprisoned under the 135th Amendment and Illinois criminal sentencing.

60. Some basic rights, human rights. Factually taken away to all inmates, persons in custody at ILDC BMACC whether At Work or Convict Date under a master to slave / Inventory Service system NOT master to servant of employment follows:

61. Forced to buy And use Signature pens or Blue pens of some design but never washable These pens are as pointed as regular

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II Facts

Standard medium Pointed Bi type Pen.
But are much harder to write with because
of thickness and firmness of pen.

They have less ink and are used more for
A Master to Slave / Involuntary Servitude
~~It makes it harder to write, be educated,~~
Access to the Courts etc.

62. TVPA talks to simple things that add up to Unjust Coercion in Findings of how [fact] § 7101 (b)(3)
63. Another policy [totally discretionary] is bringing back food from dietary given you to eat. Policy rules do not allow it (Unless Any Staff member tells you it is okay OR A Toy is given to you at your Living cells for that purpose. This is Strictly A. Psychological Master to Involuntary Servitude Coercion
64. The above fact is so noted that many states ~~the Federal Government~~ including Illinois, the Federal Government, (the 18 § 2243) make it a crime for a Correctional Staff officer to have Converting

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IV Facts

Sex with a prisoner. The Fundamental Reasons behind these laws is the same. The relationship between the Correctional Officer and prisoner is coercive. The 8th circuit in civil action brought off the 8th Amendment cruel and unusual punishment stated the Court Assumes that a prisoner cannot consent unless the officer press otherwise. Ward v Beaulieu
~~692 F.3d 1041 (9th Cir 2012)~~

b5. This whole idea is based off A master / to Slave or Freedman servitude has much rights a chattel person gets taken away. All or dispensed to only An allowed public policy need consideration. Prison officials ~~are~~ Actually Get away with common tent violations based on the "whole" Discretionary Function exception which is the definition one who is enslaved by another having A master control over ~~@~~ another human being.

Keller v United States 771 F.3d 1021 (7th Cir 2014)

Negligent Carelessness Are NOT Covered by Discretionary function exception As it involves no element of choice or judgment granted by Public Policy considerations". This is important So called Fact.

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III Facts

66. Cf And while the subject of WofS whom are suppose to be in A Set aside facility for sex offending offenders, Romantic Intimate Relationship is the best treatment for Any WofS seeking An person who can give legal Consent As it is for even the convicts of sex offenders Under the law.

67. The section 3 of ~~the~~ SDPA refers to SCOMSA that must be followed. The SCOMSA wrote Title 20¹ ^{code} An Policy [509] which must be followed for Any sex offender under its IDL criminal code Definitions in IDL. When possible Romantic Intimate including sex or less is the Best Dynamic treatment risk lowering factor that can be used. This is NOT An Discretionary Function excepting But All Defendants ~~is~~ properly withhold this from WofS And some of the Convicts who would fall under 730ILCS 5/1-1 definition for this treatment

68. Withholding of Romantic intimate relationship to WofS can be agree as A hate crime under Illinois Law based off Illinois 720 ILCS 5/12-6(1)(2)(B), (D), ~~(E)~~, ~~(F)~~, (G), (H) And the sexual orientation

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IV Facts

68. cont' of the Gay or Bisexual Wofs and convicted sex offenders at BNACC And / or the mental disabilities).

69. Under 720 ILCS 5/12-6 Intimidation ... "without lawful authority" (b) take action As a public official Against anyone or anything, OR [With held official Action] or cause such action or withholding ...
"A person commits intimidation when with intent to cause another to perform (UR To OMIT the Performance of ANY ACT ... " takes with mandatory Policy of treatment for sex offenders including especially Wofs [policy ^{com} 1509 Title 20 1509 to Romantic Intimacy Relationship is an Overt Act of Omitting the require Performance of Treatment for a sex offender or normal person

70. Facially other courts convicted of sex offense should be allowed to have sex / romantic relationships at BNACC the Policy Musters it with consenting Wofs their. Key word is Consenting. The Correctional Officer ~~is~~ coercive master/slave relationship does ^{not} exist

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IV Facts of other Coercion

71. This goes in part to WoS Cf with convicted felons to Mail And Phone restrictions . Violations of the 1st Amendment And other Federal, State, Local Laws .
72. For Convicted felons held in Involuntary Servitude the Discretion factor police exist under Illinois 730 ILCS . Cf WoS are not by the 13th Amendment And the SDPA itself suppose to be subjected to the Arbitrary Involuntary Servitude elevish or disparaging of rights .
73. Mail restrictions of 730 ILCS 5/3 - 8 - 7.5 explicitly state Any victim of the inmate or family member let FBI know its does not want to correspond with the inmate And under (c) The State Attorney Administratives Duty to do so in assisting a victim . This actually holds for both WoS under SDPA And Convicts .
74. No reason exists that for WoS to have their mail interfered with by BMECC STAFF whether legal or not . STAFF AT BMECC have no legitimate reason to open Any incoming MAIL or read Any outgoing MAIL or

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IV Facts

Deny Saturday Delivery or mailing to W of S; or Any day use of the MAIL by UPS or FedEx. IDOC and BMACC dispense this right as Slave like oppression Coercion. Allows for the deadly convicted. Illegal for the W of S.

75. The Phone system And lack of Free Access to Phone that have NO specific calling notifications acceptance is evidently prove the Facility At BMACC is NOT A set aside Facility. Absolutely NO Security reason exists for a W of S to be denied the 1st Amendment right to call Any person, or Business, or Government Agency to get help or complete A Business transaction based on Involuntary Servitude Policies. Instead of Individual Petitions -
76. TUPA §7101 talks to findings of fact how traffickers take away Support to their victims (b)(5) and substantially Affect commerce (b)(12)
77. TUPA §7101(b)(1b) notes "... enforcement against traffickers is also hindered by

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IV Facts

77. official indifference, by corruption, And sometimes even by official participation in trafficking."

78. Historically, this has happened to WofS in ILL because 1.) the SDPA started off a new statute trying to expand lesser mental illness into its facilities for the mentally ill convicted & in 1938 2.) In 1963 it purpose became Non-Criminal Non-punitive supposedly DOJ Insanity Sentence but NO official State Attorney who used it choose to enforce FDC to follow the purpose 3.) so few WofS are arbitrary chosen and exist Cf to the number of persons convicted of crimes NO one gets by task notice. 4.) Factually for WofS the average length of incarceration is 18 years. This number is largely skewed because A Real WofS is taken out of the Average. 5.) TUPA Notes § 7101 in its Findings this how traffickers hide their victims from the public for

79. But A brave, bold news reporter in MA Green

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III Facts

in 2019 wrote an Article about A Wofs
in court who had no background to even
fit the Definitive elements of a SODP
called Never sentenced, Never Released
He noted how the State Attorney And
IDOC Staff preyed upon his Developmental
Disability and mental illness

80. This started a dialog among a group of
people to acknowledge that IDOC Prison
Staff are wrong as is the SODP itself.

81. MAX Green who wrote the original Article "36
years in an Illinois Prison without a conviction
or sentence" had PBS branch pick-up the
story further "Never sentenced, Never Released".

It contains Actual transcripts from the
ORAL Argument used in the Only Case
about the SODP to make it to U.S. Supreme
Court. The 5-4 decision was primarily based
on A Set Aside facility existing that was
A Non-punitive, Non-criminal treatment
center, NOT An IDOC typical facility for
Designed for Punishment. That was the ASSISTANT
Attorney General of Illinois discussed purpose

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IV Facts.

81. Factually At Menards that true treatment facility set aside never existed, Correctly At BMACC WOs are given Arbitrarily denied rights taken off A Slave Discretionary System than they were at Menards in 1986

82. For instance, Dayroom hours lack of; At one point WOs had when treatment staff were here at BMACC Access to the Dayroom during those hours. During Non-Holidays Monday thru Friday 8AM to 2:30PM. But for the night Dayroom were Arbitrarily forced to abide by the convit schedule of 1 1/2 hours only between 8pm and 11pm.

83. Dayroom hours Are So Arbitrary Discretion of the Warden Only. Two Prison, CC, Labeled A medium security can get A variance of hours between 3 to 8 a day. Cf i.e., Ohio Correction Center being MAXIMUM security giving 14 hours of access to the Dayroom.
No Logic Safety, Security or Other Reason exist for the Justifications. Other than the Traditional Master/Slave manifestation of Slave

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IV Facts

83. Which whole institution, illegally permits
cost. was based on those people need to be treated
that way to keep them in line too.

84. Cf of convict to Wards for purposes of
The 13th Amendment. Fact stated in Court
Decisions "... on the subject of the Protection
Afforded by the 13th Amendment has no bearing
on the legality of the imprisonment of
persons duly convicted of a crime; such
persons are explicitly excepted from the
Amendment coverage [citing U.S. ex rel Smith
v Dowd 271 F. 2d 292 (7th Cir 1959)] from
Johnson v. Heene 355 F. 2d 129 (1966).

Further CASE law of Judicial Notice Facts

State: "... Johnson and Wyatt cases are the MOST
Apposite cases ... but only rely upon them AS
Support for our conclusion that the 13th Amendment
has applicability in the mental health institution
Context. ~~And~~ And the plaintiffs MAY prove sufficient
facts to prove A violation of The 13th Amendment."
Dowd U.S. Dept. of Public Welfare 368 F. Supp. 454 (197

85. Cf the policies under Title 20 for corrections
based off 730 ILCS Corrections about how much

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IV Facts

35. Discretion A WARDEN, STAFF should have toward CONVICTS with Cf WofS where none of it should be used to deny rights or dispensed rules based off individual reason to each WofS. NO Group of Individuals get their 1st Amendment Any Bill of Rights denied Unless Only criminal convicted for the discretion And level WofS do at BMZCC

36. Factually the arbitrary Discretions is Against Public Policy and law to WofS at BMZCC by All STAFF of IPAC failing to Utilize the least restrictive Alternative. This goes to dayroom, outside time allowed, Use of the Law library, use of Wards Process, giving at Pain And Cold over the counter medication, transport to Counter other Writs And meeting needs of patient by mail delivery.
Cf for the Convict its discretion AS A Master to Slave Usually gets upheld in Court even with Public Policy

37. These next group of Facts Are presented to the Federal Court to show A set of facts

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IV Facts

87. exist not only to the initial claims but also exist to the Standard reply by Defendants Attorney NOT understanding the laws application to convicts vs WofS or Ation Parens Patriae group

88. These facts are based off a Appositive Ation Court Decision from Federal Court. Noting Administrative Courts [the SOA creates A state circuit court of criminal trial into An Administrative Court At Only the State Attorney of that County] create an affirmative duty to those they Adjudicate for And as does the whole defective process of that individual Cf Santiago et al v City of Philadelphia et al 435 F. Supp. 136 (1977)
The Biggest difference is this lawsuit Are Claims of Constitutional violations exist to the 13th Amendment And 14th Amendment Are the only two Similar Bill of Rights violations. This lawsuit uses the 1st And 9th Amendment Cf Santiago Used the 8th Amendment As does this lawsuit

89. Differences between Santiago And this Claim
most all my claims are for tort civil remedy

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IV Facts

89. based off illegal Activity of All Defendants
cont. from Federal Law TUPA § 7101 et seq.;
18 § 1595, 18 § 1590, 18 § 1593(A), 18 § 1589;
based off 18 § 1595 Civil Remedies.

Santiago Cf was off State tort Law And
Constitutional Federal Claims. I seek to
Address the State Law tort violations in
State Court As Illinois uses very similar
Code of civil procedure but also different enough
to justify keeping them separate to protect
my rights. Things like factual specific
pleadings in Andrew , right to respondeat
in Discovery to name a few.

18 § 1595 And TUPA was not available for
Santiago to use in 1977.

90. These noticed facts do exist from Santiago
that are factually applicable to this lawsuit.
The Santiago lawsuit named all Staff at the
Facility as Defendants for damages because the
Allegation alone in the lawsuit of practice by
these defendant was good enough to get more
discovery to prove it.

91. This lawsuit factual true Allegation is All Staff

Adameczyk

S.D. Fed. Court of ILL.

IV Facts

91. of IDC at BMRC and Wexford Staff At
centr BMRC; 1) Have, had An Affirmative Duty to
Report acts of neglect By care, unneeded
pain suffering by Any staff, or Facility Physical
designs example cells As used for rescaled
housing of Wots. And neglect treatment, and clutter
- 92) 2) All Staff illegally participated in following
Any and all the Involuntary policies Used on
the committed population, but illegally used on
the Wots adjudicated with mental illnesses
This especially goes to IDC treatment Staff
And Wexford medical Staff
93. ID Santiago at 155 (D.) discusses the legal
theory behind their factual statements.
I believe my lawsuit is Actually Stinger
Alleged based off Federal Statues off
the 1988 1595 claim to civil remedy.
94. This goes to the fact that my 42 § 2000d
claim to the declaratory Judgment part could
possibility be dismissed ~~as~~ without prejudice
~~because~~ I did not file a complaint with
the Federal agency first. But I did ~~as~~ at

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III Facts

94. 3 separate occasions request my self-appointed Guardian ad-litem in my case the State Attorney of DuPage County to Address the Horrific Detention Issues at BMRCC for me And All Inmates of the State. To me they are the specific State Agency responsible to see I AM NOT MIS-treated, mis-treated in the state institutions.

95. But As far As Damages An exhaustion of Remedies to the past serves no purpose in requiring the Federal Agency to get IDA/BMRCC to be in compliance with the Federal law. I did nothing to slow down the filing for damages. It was other State Agencies that prolonged the Damage Awards And claims Amounts.

96. The Reality of this lawsuit is very similar to Santiago that Ultimately Respondent Superior (The State of Illinois), IDA Agency, County State Attorney Agency will pay out the monetary damages. "Respondent Superior is A deliberate Allocation of risk by which the costs Arising from individual Anticipated harm to

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IV Facts

96. Innocent individuals caused by Actions
cont'd of employees are borne by employer.
This is remarkable since the employer, rather
than the injured party, is in a better position
to absorb the cost, issue against them
and distribute the cost to Society."

TO Santiago at 148 B.

97. And the State Agencies Under Illinois Law
are also in better position to sue its
employees to recover the damages.
Santiago also notes Respondeat Superior
has been used in itself to protect individual
rights from Abuse by repositories of
State Power. This goes to part of the
10th Amendt Constitutional Violation
Along with Federal TUPA Abuse of Law
Claims TO Santiago at 147-148

98. TUPA § 7102 "Definitions (1) Abuse or threatened
abuse of law or legal process... means the
use or threatened use of law or legal process
whether administrative, civil, or criminal, in
any manner or for any purpose for which
the law was NOT designed, in order to

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IV Facts

98. exert pressure on another person to cause
cont. that person to take some action or refrain
from taking some action"

99. TUPA § 7102^(b) findings "(b) In some Countries [U.S.-I
enforcement against traffickers is also hindered
by Official Indifference, by Corruption, And
Sometimes even by official participation in
Trafficking!"

100. TUPA § 7102(3) under definitions "Coercion"
means (B) Any scheme, plan, or pattern intended
to cause a person to believe that failure to
perform an act would result in serious harm ...
or (C) the abuse or threatened abuse of the
legal process

101. All staff at BMCC are part the Active or
official indifference NOT reporting Abuse and
neglect Part of Abuse of the law (SOA)

102 Some Staff Abuse the process and are more
Coercive by Abuse IDOC policies with
Threats of segregation, withholding treatment
and other things And by actually doing it.

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IV Facts

102 Wexford medical staff benefit by pay off their dealings with the WofS yet treat them as chattel human property to forcing unnecessary pain and suffering to medical care. For instance WofS old and incapable of cutting their toe nails infected with Fungus are left to suffer, Headaches are never dealt with right away so a neutral ill person has to suffer the pain, cold medicine never dealt with right away, As with tissue to even blow your nose (IDK passes out only one roll of toilet paper a week rough kind) Yet wexford has staff 24/7 at Bnsc their policies and staff indifference to WofS ~~pain~~ physical pain occurs on a daily basis. Acts of omission to the bad clothes, extreme heat of cells also proves their participation in Involuntary Servitude under 18 § 1390, 18 § 158, and others, 18 § 1961 et seq

103 Examples of IDK staff at Springfield the Grievance Review Board ignores the Law, Abuse the law with Grievances filed by WofS taking away (st Amendment rights) to grievance as a class (see exhibits) And factually

Adamczyk S.D. ~~East~~ Fed. Court of Ill.

IV Facts

103. the need to investigate themselves that
wards are held in Insolentary Servitude
As the convicted Chattel property.
See exhibits.

104 Even the public relatives person has an
Affirmative Duty under the SPPA to tell
the public there are in a set aside facility
Not A Slave Correction Center, That different
ID's exist for a WOES. That person fails
At their duty.

105 Factually Judicial Notice goes to support
Above facts from 2 U.S. Supreme Court Cases
that address how Specific expectations to
Liberty and property — And duties to perform
can exist based off State Statute or Policy.
The State Statute or policy by these cases
Apply the General Due Process clause to Privileges
And Immunities but made by explicit expectations
Specific

106 Cf the above to claims under the 13th, 10th, 9th,
1st Amendment more And 5th specific constitutional
procedural powers of privileges (rights).

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IV Facts

107. In Wilkinson v Austin 545 U.S. 209 (2005) :
"A Liberty [or property] interest may arise from the Constitution itself, by reason of guarantees implicit in the word Liberty ... or it may arise from an Expectation or Interest created by state Laws or Policies [citing Wolff v McDonnell 418 U.S.-539 (1974)]"

ID Wilkinson at 221 -222

~~H&H~~

108. The other U.S. Supreme Court cases talk about Affirmative Action arises by State Laws because certain Special Relationships by State Agency or State are created from ;
" ... from the limitations which it has imposed on his [Wolff] freedom to act on his own behalf, through imprisonment, institutionalization, or other similar restraint of personal liberty." Vischer hostility (b) At ID Deshaney at 1050

Deshaney v Winnebago County DSS (D9 S.C.T. 998 (1998))

109. SDPA creates a sharp expectation to the Safe keeping of a convict when Under 730 ILCS 5/3 Corrections Sentencing And Imprisonment Laws
The SDPA creates the Utmost Special Relationship

Admancyk

S.D. Fed. Court of ILLC

IV Facts

3-1-19

109. The Corrections 730 ILCS 5/ ~~PA~~ create one's
cost for The imprisoned to be treated like Chattel
Slaves losing rights and disapproving them.
Getting the minimum allowed by the current
native society because of punishment.

110. The SDPA statute disallows punishment criminal
responsibility when the State Attorney County Agent
makes that Administrative decision. It is
Supposed to be Nonpunitive, Noncriminal manner
in offering care, treatment, and safe keeping.
cf with The Sentenced under 730 ILCS
5/5 - et seq. and 5/3 - 1 thru 19 where a person
is Involuntary Servitude / Slave Chattel piece
of human property.

111. The "Facility" is Statutorily required to be
A set aside one as are all staff dealing
mentality by Statute A fiduciary duty exist
just Master to Slave cf convicted And
sentenced but Guardian - WARD

112. The SDPA has explicit expectations of An Attorney
Appointed in All proceedings under the sections
of SDPA = Section 2 Acknowledges
Commitment ~~to~~ proceeding, And Detention does.

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III Facts

113. As to factual Chattel Slave Policies of ILLB
 BMRCC, the Plaintiff claims these categories
 are being wrongfully done to him and all Wots.
 (1) Inadequate residential living house issues, e.g. cell,
 size, heating and cooling, (2) General abuses
 BMRCC rules e.g. Int. wetting, bringing food out of
 dietary, fire at meals, walking in lines, (3) Improper
 suppression of Liberty. e.g. dayroom hours, recreation
 hours, outside hours, use of gym, use of yard, Phone, Mail,
 use of commissary, use of mail order for commerce,
 (4) Denial of usual chattel employment and discrimination
 in job assignments, (5) denial of adequate educational
 and treatment services to reclaim, mental health,
 and SGMBA (6) inadequate clothing provided,
 gives out or even allowed to buy, (7) solitary
 confinement issues, (8) unjust enrichment
 off & 42RS of state making them buy basic
 minimum levels to medicare, hygiene, clothes,
 mental health products and extra food to supplement
 a diet, (9) just ~~not~~ using least restrictive
 use of handcuffs and other restraints

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Facts

114. One of the expectations and Affirmative Duty created by imprisonment and/or institutional confinement is Prose filers, Non-Attorney get, MUST Get less stringent standards in Pleading the complaint. "A Prose complaint however is not fully pleadable must be held to less stringent standards than formal pleadings drafted by lawyers and can only be dismissed for failure to state a claim if it appears beyond doubt that the plaintiff can prove no set of facts in support of his claim which would entitle him to relief."

Estelle v Gamble 97 S.Ct. 285 (1976) at 292

Known as the Haines test based off Conley v Gibson 355 U.S. 41 (1957)

115. Illinois Court of Claims Act takes Sovereign Immunity away from State Agencies, the State for monetary damages off False Imprisonment, breach of contract (The SDPA mandates to its ward) and other reasons. Therefore Respondent Superior can apply to the IDOC for Constitutional or tort Federal claims.

IV Facts

115

cont.

More factual proof for naming All Staff and IDOC Agency (Department) being responsible. UNDER Illinois Criminal Code speaking directly to IDOC (where WOTS are put)

730 ILCS 5/3-2-2 Powers and Duties of the Department. No particular staff member is named, but the Department itself has Numerous Duties and Powers.

Adamczyk

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Exhaustion Remedies (Not Applicable ^{but} ~~not~~ tribal to)

116. I have tried to bring to the Attention of the illegal Activity towards me and the other Wards to over 50 Staff of IDC and many more Workforce Staff. They refuse to ~~not~~ acknowledge the fact that false Imprisonment because it is done under IDC Policies for clearly Criminal conduct exists. Part of being subjected to Incubitory Services is the people involved Actively participating for financial gains therefore not even Addressing the fact it exist

Under 10 § 1585 Civil Remedy to Federal Tort violations of TUSA ch-78 § 7101 et seq. And 18 § 1590, 10 § 158
18 § 158 , 10 § 158

An exhaustive of a remedy would be just expected. As well as to Constitutional claims to the 1st, 5th, 10th, 9th, 13th, 14th Amendment, A person trying to get out of the Incubitory Services by defaming the perpetrator would not allow Any fair Grievance to take place.

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Exhaustive Remarks

117. I tried on 3 separate occasions if not more bring up the subject with the County State Attorney to the Detention Problem seeking that Administrative Agency to Address the issue. They never replied.

118. To 28§1331, 42§1994, 18§1595,

I will offer as proof that the Grievance System itself is a Slave only one. They do not allow a class of persons to file grievances together. Do not allow even their Police to complete themselves to the process of witnesses.

119. Never the less biggest proof ITC Staff is involved with the Grievance system is At Amerc and ITC review they Admitt Facility placement is Not Grievable Supporting the fact to a facility set aside made by Statute is violated AS is the claims stated by the Plaintiff
See exhibits

120. Further Fact the PLRA exhaustive of Penalties page 47 of

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Exhaustion of Remedies

(20.) only Applies to criminal pre-trial detainees
and prisoners only criminal convicted persons
its Exhaustive Remedies are NOT needed
even in 42§1983 claims

(21.) Facts to support above. (1) Immigration Detainees
do not have to follow PLRA exhaustion Remedies
they are NOT prisoners under PLRA. or even Pre-trial
criminal Detainee. (2) Neither are WOTS.
The purpose of Act is to hold them NOT
Criminally Responsible (3) Detain for treatment
only ~~use~~ in a Noncriminal manner.
(4) The Criminal prosecution was at the
County State Attorney discretion ended, therefore
the filing of A 42§1983 is akin to a
person filing after being freed from a
prison. (5) The Statute never intended them
to file thru A Prison Grievance System
by design to be a denial of certain rights
And coercive itself

(22) Nothing in this section endorses the idea
that for 42§1985 or 42§1983 claim A
Noncriminal person must use the Criminal prisoner
Grievance system (only one at BPPC)

Aclamczyk S.D. Federal Court of Illinois

V Claims I

122. Civil Remedies under 18 § 1595 (a) "An individual who is a victim of a violation of this chapter may bring a civil action against the perpetrator (or whoever knowingly benefit), financially or by receiving anything of value from participation in a venture . . .) in an appropriate district court of the United States and may recover damages and reasonable attorney's fees.

All defendants thru actions and inactions were perpetrator and/or knowing financially benefitted 18 § 2411 Conspiracy Against rights. This makes it one possible way to show how the Board range of Defendants named are liable under 18 § 1595. That coupled with a class action motion. This goes especially to Lexington Health Source A) Respondent Superior And its Assigned Staff At BMECC who work there. The Defendants fall under 18 § 241 by their occupational dealings with Works of the State whom are entitled to UTMOST Care.

1595 + 18 § 241

123. 18 § 1887 also is a Federal Question of Civil Remedy that fully covers 18 § 1595 chapter violation section (a) includes all ways of being involved by knowledge above of workers, transports, recruits provide or obtain by any means for Labor or Services.

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I claims I

123. The Service of being Chattel human property for
costs. IND TO AF BANK to get over \$34,000 per head
OF inmate, Person in custody. Allows All
staff to benefit financially.

" 13 § 1590 (b) Whoever obstructs, attempts to
obstruct or in ANY way interferes with
or prevents the enforcement this section shall
be subject to the penalties under subsection (a)"

~~For~~ For purposes of civil Remedy

13 § 1595 this expands the staff who can
A) A state official And individuals play
a role in the illegal tort consequences of
Peonage, Slavery, & Involuntary Service or
forced labor Under 13 § 1590

II CLAIM II

124. VIA 13 § 1595 Civil Remedy over 13 § 1589
Forced Labor with or without 13 § 241
(a) whoever knowingly provides or obtains the
labor or services of a person by any one of,
or by any combination of . . .
(1) by means of force, threats of force, physical
restraint or threats of physical restraint
(2) by means of serious harm . . .
(3) by means of the ABUSE or threatened
Abuse of the Law or legal Process

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I Claims II

124. (4) by means of any scheme, plan, or pattern
cont. intended to cause ... would suffer to serious harm
or physical restraint

(b) whenever knowingly benefits, financially or
by receiving anything of value ...

All Staff at BMECC and IADL collect wages
At the Slavey, Peonage System by virtue of
the law knowingly the SDPA, made WofS
WST put their for Peonage reasons.

(c) (1) defines "abuse of law or legal process"

"(c)(2) The term serious harm means any
harm whether physical or Non-Physical
including psychological, financial,
or reputational harm.

The list of things done by Welford and
BMECC Staff Against the mental health of
WofS would fill 100's of pages. But here are
a few. Physical abuse of pain by hand-wrapping.
Name calling by Staff done for psychological
and reputational harm and to degrade the person
punishing mentally ill person and developmental
disabilities without the process of their own
polices and Against people who cannot comprehend
their method, taunting food that they get
from dietary At the expense of the WofS

X punishing mentally ill person and Developmental
disabilities without the process of their own
polices and Against people who cannot comprehend
their method, taunting food that they get
from dietary At the expense of the WofS
welford doing pain medicines Page 51 of

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II Claims II

124 Wexford Staff refusing to prop ~~for~~ quickly
Cant relieve pain of a Wots to headaches,
cold, Flu, Alleges symptom relief with
Over the counter medicine.

Wexford Staff ignoring wards, health care
issues to lack of proper shelter, clothing
provided by their Contractor IDX at Bruce
not for Wots.

II Claim III

125 TVPA²² § 7101 et. seq. to add Statutory
Facts, And use itself for appointment
of U.S. Attorney General by court
for this civil prosecution if the
State Attorney (and Agencies / Guardians
Ad-litem refuse to do so.

See motion for appointment of counsel
TVPA § 7101 et. seq. is meant to be used
Also with 18 § 1595 it is allowed for
such purposes.

II Claim IV

126 VIA 18 § 1595 ^{under} with 18 § 1592 Staff at Bruce
use IDX policies to extort the ~~for~~ getting
of government identification documents, birth certificate,
Social Security, Soneline refuse to ever get them

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II Claims IV

126. They, held them from WofS without their
cont. permission. This staff does not obtain
the needed documents. This includes staff that
deals with Trust Fund Account of holding of money
who also fill under 18 § 1590, 15 § 1589, will or ^{1082 et} other

All Claims Additional facts

127. All the claims incorporate all the facts stated
from 1-thru 121 in support.

Some specific ones show the Director and his
staff Branch of Duties to WofS

The ~~WADDE~~ and his staff Branch of Duties to WofS
were not ~~WADDE~~ same and their Branch Staff
Branch of Duties.

128. All Defendants participate in abuse of the law
in relationships that WofS ~~STAFF~~ were not to ~~not~~
be handled, dealt with, the same way as
A convicted felon at BMOCC who as
punishment get Peinge, Slavery, Insubordi~~not~~
Servitude allowed.

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X Claim X

129. By Jurisdiction 18 § 1395, 28 § 1331, violation
of Supreme Law of Land 13th Amendment
And/or 4th § 1984, And 18 § 1581, with or w/o 18 § 241

130. The 13th Amendment is the most specific
procedural Constitutional Guarantee to people
in the United States. Cf to The Equal Due
Process given ALL people in the United States
to the 14th Amendment.

Slavery Or Involuntary Servitude is
NOT Allowed unless A duly conviction of
A Crime for punishment

All Defendants violate this basic Civil Rights
to the Plaintiff and the class of Wots under § 8
the SOFA who are suppose to be detained Not
incarcerated in IDC³ BMFCC. (Basic Criminal Law)

A Facility Set Aside for different persons
of treatment NOT Retributive, Vindictive
punishment.

All Defendants are abusing the Supreme
Law of the Land 13th Amendment in relationship
to Wots. The Gross Negligence by All
Defendants Shows An objective Deliberate
Indifference to basic rights Any person has
instead of Chattel Slave property only rights

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I claim V

(3D. I DOX policies And Staff use of them
cont. offer proof of Subjective And Objective
Deliberate Indifference towards the mentally ill
And Developmental Disability (mentally Handicapped)
placed At DOX's Branch for treatment, NOT
Residential

¶

I Claims VI

(3L. All Defendants "Respectively As or to
the people," under the color of State Law
Are Prohibited by the SDPA, and 13th Amendment
to AS individuals or/and State Officials
to enslave or Involuntary Servitude another
Person. The power to do so is both Prohibited
by the State Law, SDPA, which places the w/o/s
Plaintiff into treatment Detention, and the Supreme Law
13th Amendment procedural requirement of
Legal Slave or Involuntary Servitude.

The Power of master - Slave All Defendants
use over to humiliate, degrade, physically, financially
psychological harm, ^{All Serious harm\$,} for their financial own benefit or personal distorted
way to self inflate their own ego is NOT

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II Claim II

(31. NOT Allowed Under the 14th Amendment

Cat. All Defendants Actions And Omissions To Act

Ament to objective Deliberate Indifference

And ^{objective} subjective to Abuse of Power in

Their Job Duties towards Plaintiff Rights.

(32. The Indifference of letting other Staff
Abuse the mentally handicapped Placed in their
Safe keeping, care, and treatment is gross
negligence itself to Abuse of "Powers to
the people" from the 14th Amendment

(33. At all times All Defendants knew Affirmative
Duties existed for the WofS, mental
Handicapped at the State institutions because
it housed Both Convicted felons and SDF,
WofS. The Power to intervene existed
but All Defendants were Deliberate Indifferent
to do it. ^{pervage} ^{civil penalty}

Thru 28§1383 with 18§1381, 18§1595, 18§1589
or under a different analysis 42§1994 pervage, 42§1983

No set aside facility exist physically or
policies. To 18§1961-1968 To ~~18§~~ 18§1951 Racketeer
To mail Fraud, To wire Fraud

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If For Claims ~~DO~~ MSRE Factual Support

134. more Facts for ALL claims to show the level
of gross negligence of Defendants Indifference by
All Defendants but especially to prevent

Due process violations to 8th Amendment And 1st
or ~~the~~ using the 13th Amendment to Incorporate
Specific Slave type other Amendment Denied
or disengaged under the SAME Theory to the
14th but stronger use of it right NOT to take
away. (4th Amendment privacy issues.)

135. All Defendants Know or should know, but
At BMECC Know the WofS since 2004
where reiled in separate wings from the
Convicts at BMECC. Currently WofS have
2 of the 17 available male cell house wings
at the Facility.

136. BMECC Staff know they are ^{WofS} indefinitely Detained
not criminally sentenced for incarceration.

137. All WofS are detained by having a mental illness
All Staff at BMECC especially Westford Know
A higher % of the WofS take psychotropic medications
for their mental illness as part of treatment than
the criminally convicted.

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IV For Claims more Facts

138. All Staff especially workload staff know that the really ill WOFs are given inadequate clothes, See them were holey t-shirts, Faded Extreme Dirt clothes, NO socks, Holes and mold on their Underwear in physical exams required each year. Yet refuse to speak out to this

139. It is illegal for any person to be denied meals Dietary AS disciplinary reasons or NOT but Correctional Officers routinely (meaning ^{to see} ~~groups~~) deny the WOFs because of their medical illnesses meals without NO regard to easier alternatives AS they do for convicted felons

140. The policy of even forcing A WOFs to get up and be ready for breakfast ~~at~~ between 4:30 AM and 5:30 AM OR miss it shows how much ~~of~~ gross Negligence And Deliberate Indifference occurs towards WOFs

141. " 730 ILCS 5/3-7-2 (d) All institutions and facilities of the Department shall provide every committed persons with a wholesome and nutritional diet at regularly scheduled hours . . . "

" 730 ILCS 5/3-8-7 Disciplinary Procedures

Adams v. ILK S.D. Fed. Court of ILL.

IV For claims more Facts

141 (b)(1) corporal punishment and Disciplinary
cont. restrictions on Diet, medical, or sanitary
facilities, mail or access to legal material.
Are prohibited "

Yet numerous times Wots are Denied
Dietary meals for speaking for themselves
or others, for being left out of cell to
A shower, for manifestations of their
mental illness. Staff at BMCC Do this
without total disregard for the mentally ill
person and their rights and the law.
While it may not occur everyday, If occurs at all is wrong.

142 Factually to see part of the tie to the School
District Staff at BMCC and Springfield
hired by the State. BMCC Law library is
part of the School District and is the same
building for education from the School District
Staff There are over 50 computers in the same
building having Word Processing capacity
yet NO Access is granted for legal filing
to use them. The most basic of things the School
District has to use is denied for No persons
other than the Thattel Slavery Policy at BMCC
being illegally used on Non-Criminally Convicted
Wots to use WORD Processors for legal work/ treatment.

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IV For Claims more Facts

143. USE only of GED , instead basic High school completion And/or special education at IDOC BMCC And/or Access to post education Colleges for Plaintiff(s) further establishes the School Staff participation in Violations of Laws And Constitutional Rights

144. The Treatment Staff does not even follow their own mandated SOMBA Title 20 code 1905 rules for best treatment methods - This with their Acts of omission to proper care provide proof of how bad it is for the Plaintiff(s)

145. The Southern District Federal Court has already noted IDOC, BMCC, and treatment Staff Fall far short of offering bare minimum Amounts of therapy And kinds of treatmet models specific.

* Claim VII 18§1595 or 42§ 1983

146 Under The 8th Amendment, 14th Amendment And/or 13th Amendment, 10th Amendment, 9th Amendment certain rights NOT mentioned the following violations of them Amount to cruel And Unusual form of punishment Used for Disciplinary reasons toward mentally ill or developmental Disability persons Plaintiff class Action. Understanding sometimes Discipline may be needed.

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II Chm VII

146 Applying Disciplinary reasons Arbitrary And
Wrongly to A mentally ill And/or Developmental
Disability person. Specific examples denial of
Dietary needs , allowing UNSANITARY cells,
clothes to exist because of following the
Chattel Slave person policies or even ignoring
them too. Staff using a Punishment to
deny ~~complaint~~ put a WOTS on Commissary
or Any restriction without ignoring the
WOTS And mental illness makes it cruel
And unconst punishment Violating 8th Amendment
These goes especially to the Correctional
Officers Staff at BNACC. They Act in their
state official capacity under the color of
Law, abusing the SPPA And 13th Amendment
itself And in their individual capacity
to be cruel to A Mentally Handicapped
person by punishing without even knowing
the complete history of the person or their
unique needs and issues of mental illness.

147. Factually it is a person some C.O. Staff
refuse to be assigned to the 2 wings of cell, WOTS
having Kneeling Index training is far
to inadequate for those decisions, the treatment

Admencyk S.D. Federal Court of ILL.

I claim VII

148. In dietary W of S are forced to eat in sections away from the convicts most of the time, but this does not get them any more basic human rights to time to eat, ~~but~~ more consideration in appropriate diets, or allow them to bring food back to eat later, yet dietetics always get food to bring back later to eat from warden staff.

149. The Chattel Slave policies are another example of cruel and unusual punishment for a W of S in violation of 8th Amendment. Factually the Job Assignment Convicted Slaves get more food usually than even the NONCRIMINAL W of S and more time to eat. The convicted felons get higher slave wage Job assignments than W of S.

150. The Treatment Staff, warden Staff hurt And conspire together to hurt W of S by their statement to C.O. Staff about the specific (or group o W of S). And All Defendants by Acts of omission in working together for the Utmost Safe keeping, care, and treatment This includes ILL Administrators lacking policy.

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Admcyk

S.D. Fed. Court of Ill.

I Claim VIII (B)

151 Violations of the 1st Amendment ~~are~~ occur by all defendants primarily based on the lack to freely associate within the facility, outside the facility thru phone or mail, within and outside the facility for treatment staff best suited to treat IDe Administrators And hiring staff have cause their own issues to hiring by using the color of State law, Federal Law, to abuse the law towards WOTs. Hired staff for treatment (not knowing they visitors basic mental health and medical treatment principles). Therefore turnover is extremely high. MOST Social treatment staff reject jobs offer after seeing abuse towards WOTs, mental ill persons noting an abuse of the legal process must be occurring. They choose NOT to participate as a government employee to the indifference 1st Inductory Service for WOTs at BMSCC

152 Factors part welford uses video treatment staff to supplement the ~~mental~~ medical treatment needs with specialist. As Does IDe mental health with Psychiatres to video session

Adamczyk S.D. Fed. Court of Ill.

IV claim VIII (a)

151 Violations of 1st Amendment occur to freely associate by all Defendants within the facility and outside the facility. This directly hurts the care and treatment of the Plaintiff(s).

152 Within the facility, Best treatment calls for romantic intimate relationships when possible.

153. There are over 1500 inmates with potential to give consent to having this kind of beneficial treatment. BMECC has no policy set up for this to occur. A high percentage of convicted inmates are in need of sex offender treatment themselves.

154. Employment for the Plaintiffs as employees is a Agency policy Statement under 730 ILCS Corrections, but it is ignored by BMECC Staff.

155. Dietary needs for the Plaintiffs which the 7th Circuit has already stated are entitled to more considered methods of meeting their needs could be done within BMECC own kitchens including more time to eat, eating at better food and more and better food, and food allowed back to cell.

Adamczyk S.D. Fed. Court of ILL.

V Claim VII (8)

156. Dayroom Access for at least 14 hours a day,
Access to the Library for everyday is easily
done. These are things the 7th circuit stated
Plaintiff(s) have rights too in a broad sense
As i) Access to WORD Processor, regular pens
And other 9th Amendment "certain rights"
Some may seem trivial but the Accumulation
of each is devastating especially for me A
person with a Developmental Disability to
writing without A WORD Processor.

The Desharnay case states Affirmative Duties
exist because of the ADA's special relationship
to getting what the Allies case said
more considerate than a Criminal court.

157. Outside the facility NO Person for WOTS
Plaintiff, exist to restrict mail by reading it
Nor phones by a penal function use. In fact
State Attorney Are suppose to as part of their
Administrative functions Under 735 ELLS
Resolve these issue before ANY
Person gets to FDOC.

Adamczyk S.D. Fed Court of ILL.

X Claim VIII (8)

158. Factual proof to the Sex offender treatment program being so poorly administered. They do not take advantage of Video conferencing to use in treatment. While in person is the best, to use Video treatment staff for individual meeting or groups is far better to nothing. This goes to using 1 personal computer for each WOFs in combination.

159. Westford Health Staff uses A lot of medical Specialist ~~to~~ by Video conference to treat specific illnesses as well as talking to outside persons.

160. IDC mental health uses ~~one~~ Video Specialist too. At BMCC Psychiatrist are used to prescribe mental health medicine if needed and for therapy sometimes.

161. IDC uses the excuse that it had to hire treatment staff. This is a denial and distortion to legis.

162. MESS trained, well trained mental health professionals know the care offered at BMCC is far short needed for any treatment to designed to work for most of the WOFs.

Adamsyk

S.D. Federal Court of Ill.

¶ Claim VIII (B)

162. So after researching the facility do not apply or quickly ~~decide~~ decide to withdraw their application. This happens especially after a tour of BMFCC seeing crimes may be occurring towards Wards. The Statute SDPA requires CARE & Treatment designed for Recovery.

163. Others who get hired quickly quit or stay with the intention for a period to build up a resume for a "better job" one that does not violate the law and especially the mental health professional ethics. Even IADL BMFCC mental health staff turnover at a high rate based off this fact.

164. The Above 1st Amendment violation is from an civil remedy under 18§ 1595, with or without 18§ 241, 18§ 1381, 18§ 1589, 18§ 1592, 18§ 1590, 18§ 1951 incorporation of the 13th Amendment by Acts of omission (cf) to convict staff All defendants work ~~with~~ with at facilities to freely associate for purposes of commerce, to grievances / Advocate, treatment, Friends / Family,

Adamczyk S.D. Federal Court of Illinois

¶ Claim IX (a)

164 18§ 1955 gives civil remedy that needs to be proved by A preponderance of the evidence to all tort claims from Chapter 18 criminal law. All defendants by 18§ 241 ~~(b)~~ with 18§ 1951 or by only 18§ 1951 violate the plaintiffs right to be free from "Racketeering" FDOE STAFF set up policies to facilities Commissary And the mail And phone Chattel ~~or~~ disparaging of these rights. BMACC has a Commissary And phones And A mailroom And multiple spots to drop off Commerce All STAFF including Lexington know of these things (including Vendling ^{OP} sites machines they can Access or freely order food from the outside of this facility.) lexington to ~~moderate over the counter~~

Racketeering is defined as "Interference with commerce by threats or Violence" which under "(a) whenever in ANY WAY or degree obstructs; delays, or affects commerce or the movement of ANY Article or Commodity in Commerce, by robbery or Extortion or Attempts or Conspires sb to do, ..."

18§ 1951 (b) (2) "The term extortion means the obtaining of property from another

Adamczyk S.D. Federal Court of ILL.

IV (Claim TX (a) continued

164 with his consent, induced by wrongful use
cont or Actual or threatened force, violence, or
fear, or under color of official right."

165 All defendants use fear and some actual or
threatened force. All certainly wrongfully use
color of official right by IDOC staff there
is Plaintiffs are in a Fiduciary Guardian-ward
relationship, but IDOC and BMECC staff, weekend
use the master-slave same as convicted felons.
Weekend staff too use the winter days least
bare minimum of master/servant instead of
UTMOST medical care done quick as possible
to common pain problems of headaches, cold, flu.
This claim extends to interference by withholding
taking legal copy and legal filing fees by IDOC
staff at BMECC, taking money from their trust
fund, That taking of money which IDOC by
JDPA is required to pay as Guardian, greatly
Interferes with Plaintiffs right to commerce
As does the delay in ever paying State Pay wages
of a slave that all Plaintiff get for the service
of being certified at BMECC. ~~one month~~ 2 weeks or
longer
The Defendants could easily accommodate for the
wots, Plaintiffs, to buying goods by phone and mail
And credit, but choose NOT TO DO it

Adamiczky S.D. Fed. Court of ILL.

II Claim ~~18~~(Ten) (AS Alternative Possibility)

166 42 § 1983 Allows Every Person to file for
 A deprivation of rights allowed by the 1st, 4th,
 5th, 7th, 8th, 9th, 10th, 11th, 13th, 14th Amendments
 All defendants with or without 42 § 1985(2)(3)
 by acts of omission or acts of oppression
 Actively does use the Chattel facility
 And Chattel facilities policies IDO made for
 Chattel punished persons in Institutional Service.
 Instead of A set aside facilities. the Plaintiff
 Are required to have for treatment and care
 And to safely keep
 Even though the Plaintiff suffer from mental
 Disabilities or An mental illness or developmental
 disability. They too are an Every Person
 Entitled not to have so many deprivations of rights
 As the Chattel persons in IDOC

This claim is A General one to talk to 4th
 Amendment right to Arbitry vs (Cf) the Discretionary
 Curated Chattel persons

167 The 5th Amendment right to having property vs
 ((f)) the Discretionary Master to slave ones in
 use at BMECC goes to in Adequate shelter.

168 Every the right to use, own, A regular pen that
 falls under the 8th Amendment is taken away

Adamszcylc S.D. Federal Court of ILL

I Claim X (Ten)

168 It is set truth when disabilities exist to write with in the first place. Coupled with the exertion of even having to buy segregation Pass in the first place

169 The 7th Amendment right to freely be able to see and 11th Amendment right to see the Stats gets wrongfully hindrance but can be overcome because of the ① confinement ② But worse wrongfully Imprisoned incarceration that Defendants subject plaintiffs to by not paying filing fees up front, Telling Courts they are NOT Prisoners. These acts of omission offer the proof of Deliberate Indifference from the start to violating so many other basic, vested, civil rights. It is Gross Negligence on All Defendants Parts

170 The State of Illinois is liable for False Imprisonment which All Claims amount to under its incarceration of Plaintiff instead of a community like Detention facility Courts of Claims mandatory payment by the state in ~~Detention~~. The Current Detention has been in a facility designed and used for imprisonment, incarceration NOT a treatment and care set aside facility.

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S.D. Federal Court of ILL.

II Claim X contained XI(Gen)

171 The fact this gross negligence of a "Division"
 "set aside facility" has existed Always
 for the West S, Plaintiff(s) of the class action
 some of who were held in False Imprisonment
 incarceration for over 30+ years
 Shows how the State Agency Dix and
 Welford Health Care Inc. Are Part of
 the lawsuit and deserve to bear the weight
 of paying compensatory, nominal and
 punitive damages

II Claim XI

172 42§1983 And/or 18§1595 with eachs/ conspiracy
 parts 42§1985(2)(3) or/and 18§24h with or/w/o
 because All Defendants violate Plaintiff(s)
 right to the ADA 42§12101 et seq. education
 section, employment Discrimination 42§12112 and
 42§12111 Definitions AND Discrimination part
 42§ 12132 and Disabilities 42§12131.

by hiring Practices and more.

This claim two is based off all facts that show
 section 8 of the SOPA is violated by acts and
 acts of omission to a "facility set ASIDE"
 "Inoc" and "Bmed" and welford policies are for
 designed for have minimum chrtel Valued persons

Adamczyk S.D. Federal Court of ILL.

XI Claims XI continued

who arbitrarily lose benefits, services, programs
at public Federal and State Public Agencies
because the positive Chattel persons get lost.
These 9th Amendment "certain rights" excluded
or dispensed to just a human being especially
with disabilities to begin And the 14th
Amendment ~~gave~~ equal rights to privileges
Are outright denied to the Plaintiff(s) class

173 The Fact Plaintiff(s) Are all mentally disabilities
Court Administered as such but get A ~~not~~
committed status As A Non-Employee for loss of
privileges of it, but get state pay for their
Chattel warehouse services money they bring
into ILL, BMRCC and used by Welford
is the strongest proof of violations that are
repugnant, grossly negligence, And Deliberate
indifference. This involuntary Servitude Archaic practice
Proves a violation is occurring.

The Department of Corrections own Criminal Code
730 ILCS 5/3-1-1 says apply sentenced, imprisoned,
detainees ~~where~~ where A Statute says otherwise
cannot occur.

174 The fact because Wofs, Plaintiffs, mental Disabilities
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S.D. Federal Court of Ill.

V Claims XI

174. NOT A Duly criminal conviction, the Defendant
Cont. All Discriminate in hiring practices. It is fact
is Disparate Impact Against the Plaintiff(s) class
violating 42 § 12112(a)(b). Who's could be hired by Defendant

Sub Claim XI

175 Separate Part of Claim goes to Defendants within
42 § 12131 and All Defendants' Acts of omission
coupled with Section 9 of SOPA that Allows
recovery to continue in a total communit settings
And that Section 8 of SOPA MANDATES A facility
set aside designed for recovery.

176 That facility should be as close to a complete
community setting as possible to affording
A person All Available, services, programs because
of their Disability, All ~~afford~~ the best treatment
Including housing designed for Romantic
intimacy stays with or without sexual relationships
with ~~or~~ new partners or old romances

This can be done much easier ~~than~~ to accommodate
for the disabilities under ADA ^{than} reasons not to do it.

176 *DLMstedt v L.C.* 527 U.S. 581 (1999) lays the
Groundwork to access multiple Federal Agencies to help
Jantings v City of Philadelphia 435 F.Supp 136 (1977)

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Notes least restrictive setting Community needs to be
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S.D. Federal Court of ILL.

II claims XI

~~Writings of the claims based off~~

177 All the claims are based off the fact All Defendants deal with the mentally handicapped Wots, Plaintiff class action is a imprisoned master-slave/involuntary relationship. Instead of a Statute ~~not~~ Fiduciary or Relationship of Guardian-Lawyer. This type of relationship builds the foundation for Facility set aside policies designed for Recovery

178 It also allows the ~~not~~ least restrictive treatment facility that is the most like a total community setting. That is the goal of the Statute Recovery or cured, in the 1st place.

179 Employee status being a key to a total community setting under ADA for the vast range of age, disabilities of the Plaintiff class actions.

180 Other than the right to vote for the Wots Plaintiff(s) INOC Bmc is nothing like a Facility set aside designed for recovery but is an archaic involuntary servitude facility such facilities are known not to rehabilitate well at all for even non-disability persons.

V Claims XII or part of XI

180.1 To preserve this claim and emphasize that the Department of Corrections, Illinois, And Wexford Health Sane Inc. Named A Defendant. And All Staff is based off 18 § 1595 civil remedy for violation of (RICO) Racketeer influenced And Corrupt Organizations Act 18 U.S.C. 1861-1968

180.2 Wexford is An organized Business And Is Department Of IL (IDOC) Under its own 730 ILCS 5/3-2-1 + 5/3-2-2 consider itself a organization an entity. Their Staff are part of the organization. The Plaintiff claim restate the Defendants work together to wrongly Human traffic the Wards of the State (The class of Plaintiff) into Involuntary Servitude. The SDPA purpose was, is, Involuntary Treatment done in a NON punitive punishment manner. Not ineffective treatment done the Involuntary Servitude.

180.3 The purpose of RICO was to stop organized groups or other groups involved in certain patterns of illicit conduct. It includes groups with organized crime elements. All defendants have in their conduct dealings with the Plaintiff meet that criteria of extorting, denying things Against the Wards. They know or should A difference exist between And the convicts At BMRCC.

IV Claims XIII

180.4 USING 18§1595 for civil Penalties of the Federal criminal code and the Mail Fraud Act under section 18 of Federal Law and Wire Fraud Act 18§ 1343 et. seq. Against All defendants in their official and individual capacity with 18§ 241 for a claim against the Plaintiff(s) (class of plaintiffs). Part of Idox policies and staff use Interfer with mail on Saturday, being opened and read, requiring it to be open your sexting (unlawful mail).

180.5 Phones and tablets have access denied to freely communicate even to Doctors and medical advice, treatments that would be far better than Welfare or Idox Treatment staff. These practices hurt the Plaintiff, are wrong Against the Plaintiff. As none are here under the Criminal Constitution procedure that allows Arbitrary Discretionary Loss of Rights. The 13th Amendment allows Excluder Services As punishment after A duly conviction of a current criminal offense.

180.6 Most of the Arbitrarily Discretionary policies used against even the convicted felons make no sense ever courts are citizens who deserve a honest Healthcare And government

II claims ~~B.~~ XIII

180.7 But for the WOTS, Plaintiffs, who all Defendants are required to care and treat with the Utmost Guardianship over them, the wrongs of Defendants hurts them the Plaintiffs financially, and mentally, and potentially physically to getting medical treatment that is far better than what they have.

Advancyle

S.D. Federal Court of Illinois

VI Discussion of facts for Relief

195 The 13th Amendment is the most clearly established constitutional right to presumption after a duly criminal conviction. The Federal Statutes are even clear to what they mean by use of distinctions.

196 The Second Question is would it be clear that when confronted with their conduct (lack of proper action) to a reasonable official staff person that the conduct would be unlawful, necessary in the situation he confronted. Knowing his sentence was Gia or an indefinite Detention or civil commitment not criminal trial or mandatory Fiduciary relationship of
Guardian - Wards of master/slave serve to overcome Any immunity the Defendants claim. As does in this case Ignorance of the law is NOT An excuse or would be reasonable to use it.

Any denial of this only serves to prove it is an unreasonable answer to their conduct lack of knowledge. Their best putting wots in the same facility but separate ~~as~~ (cell wings), use of the word SA in police news they know SPP's, wots, exist. page 81 of

Adamczyk S.D. Federal Court of Illinois

VII Prayer for Relief

197 Wherefore, Plaintiff (class of Plaintiff) respectfully prays that this Court enter Judgment granting Plaintiff:

198 A declaration that the acts and omissions of the Defendant violated the Plaintiff(s) rights under the Laws and Constitution of the United States as described herein

199 Issue a preliminary and permanent injunction against all Defendants by first moving the Plaintiff (the class of Plaintiffs) +^{to} set aside facility with physical design for having and policies to effect proper care and treatment for a WARD of the State. Things included employment, proper shelter, clothing issued, Free access to mail and phone, Free access to at least Video Treatment, Free access to Law Library, educational methods and at levels, medical care of the utmost, Dietary basic needs meet by ~~quantity~~ of appropriate times of meals, time to eat, and access to snacks, Access to recreation of gym, outside activities, and other gaming needs, Free access to Commerce and to treatment specialist of a person choosing. Losing these privilege only by way of extensive reasons of Abuse toward sex attack.

Advancet S.D. Federal court of Illinois

VII Relief Requested continued

200 Compensatory Damages in the Amount Against each Named State Agency Allowed under Illinois Law And to seek Total Corporation fully noting All Defendants jointly And severally could have responsibility but Under Responsibility Superior the Employer is better situated to pay And recover the cost of paying \$ 450⁰⁰ per day capped at 1/4 years for what amounts to false imprisonment, loss of employment.

- Any Nominal Damages

201 - The Nominal Damage of \$ 1 dollar for Constitutional Violations based on official indifference of Official Acting Defendants, Their participation, And corruption of the ~~State~~ Agencies and corporate

202 - Punitive Damages in the amount
150,000 from INOC State Agency per Plaintiff (around 158) And
100,000 from Werkforce Health Source Inc. per Plaintiff As ways to send a message to both to NEVER AGAIN Commit such things against mentally ill / Disability person

203 - Plaintiff(s) Also seek A Jury trial on all issues tried before by Jury

204 - Plaintiff(s) Also seek recovery of their Cost in the Suit which include filing, copies, mailings, And Attorney

205 - Any Additional relief Court deems Just, Proper, And equitable.

Admnczrk S.D. Federal Court of ILL.

VII Relief Requested continued

205 - Under just, proper and equitable
 cont. The Court After trial or Settlement using
 explicitly 18 § 1593 and 18 § 3626 (a)
 (i)(B)(i)(ii)(iii) possibility (c)
 ORDER After a screening of all Plaintiffs
 whether any Assisted Living type community
 setting is needed for physical or mental illness/
 Disabilities issues for specific ones. Most
 can and will do well on their own if given
 help by State and Federal Agencies in getting
 started.

206 This type of Relief is more than Just, and
 proper given the SOPA Statute is A Civil in
 Nature Statute. The SOPA Validity is Contingent
 Upon the Detention NOT being breach to a
 Non Positive, Non Criminal facility place
 existing for treatment purpose only. (law's Construct)

207 The U.S. Supreme Courts NOTES SOPA type civil in
 Nature Statutes can Disvest of it civil Detention
 Judgment before proving the Statute positive
 Statutory scheme is Positive IN Effect.

11 The court reasoned that actual conditions of confinement
 could disvest a facially valid Statute of its civil
 label upon it showing by the clearest proof

Adamczyk S.D. Federal Court of Ill.

III Relief Requested cont.

207 that the Statutory Scheme is positive is effect.¹¹
cont. *Selby v. Long* 531 U.S. 256 (2001) at 259

208 *Alley v. Illinois* says the same thing And
This case is about the SOPA Application to
A person's 5th Amendment right to incrimination
"Where a defendant has provided clearest proof that
the the Statutory Scheme is so positive either
in purpose or effect it must be considered criminal."¹¹
Alley v. Illinois ~~106~~ 106 S.Ct. 2988 (1986) at 2993

209 A 1951595 civil remedy done for TVPA or
18§1581 or 18§1589, or 18§1590 offers
gives clearest proof that SOPA effectively is Invalid

210 The filing is not just a General Board 42§1983
claim that talks about a sentence or conviction
being Invalid by prosecutorial misconduct
But is about a civil detention Settlement
that had nothing to do with criminal current
responsibility to what was proved

211 A Civil tort cause law Federal Adjudication to
Answer Federal Questions of Law is perfect
for damages and release of the Plaintiffs

VII Relief Requested

2⁰⁸
cont. Another CASE that recognizes the SDPA civil in
nature process, recognizes the SDPA
is a Special legislative Statute and thus:
~~Certain errors~~

"... errors may be committed which will render
the proceeding void."

People v ABNEY 232 N.E.2d 784 (1967) at 783

This goes to errors in carrying out the
Statutory contract to the WOTS, Plaintiff for
A facility set aside

Adamczyk S.D. Federal Court of ILL.

VII Relief Requested cont.

212 Due it thru the Defendants own determination they find the SDPA effectively was made Invalid by their Actions they can settle giving the State Agency full chance of Asking Illinois Supreme Court Question of Law as it applies to the SDPA and Plaintiff(s) case.

213 In fact Any Attorney Wexford or IOC representing them is required so as not to participate in the crime the Plaintiff Alleges is occurring to Federal Criminal Code, but prior only to a preponderance of the evidence is A civil remedy Illinois Rule of Professional Conduct 2010 "Rule 1-2 (d) A lawyer shall not counsel a client to engage, or assist a client, in conduct that a lawyer — knows is criminal (This under 18§ 1510, 1539, TUSA would make the Lawyer liable for participating in A criminal Action too) or 18§ 1951 -

214 But Rule 1-2(d)(2) Gives A Lawyer A chance to settle the issue ~~do~~ themselves by "or" assist A client to make A good-faith effort to determine the Validity, scope, meaning or Application of the law (SDPA)

A. Adamczyk S.D. Federal Court of Ill.

VII Relief requested

215 And as Illinois Attorneys in a case like this can get the ultimate question of law validity addressed directly to the Illinois Supreme Court under ~~stat~~ Rule 381 by way of writ of prohibition or writ of mandamus

216 First, upon a physical inspection of BMRC anyone would realize the plaintiffs are falsely imprisoned, incarcerated. The Allen Writ said that would be illegal which it is.

A writ of prohibition asking if the lower court judgment ~~was~~ ended up exceeding its jurisdiction or usurping the jurisdiction. Prohibition occurs too because the validity of the SOFA rest upon A civil detainees relationship NOT A master/slave Criminal incarceration.

217 OR a mandamus to question if any of the Federal law violation including the BJC Agreement invalidates the SOFA effectively ~~shows~~ if effectively shown. Illinois Courts routinely use MANDAMAS as the proper way to rule on A ~~Boarding~~ State Guardian Appointment being wrong to conditions of safe keeping.

Adams et al S.D. Federal Court of Ill.

III Relief Requested

218 Judicial economy actually works best when Applied in this case saving Any other further filings in the Federal Court And A Settlement reached by parties having A chance If the Defendants follow the Law And Rules of Professional conduct and Act in Good Faith.

219 The Plaintiffs class is around 158 people some of it has served over ~~the lifetime~~ of 40 years falsely imprisoned in FDOC. A larger amount of over 30 years. The Average Amount of time of False Imprisonment is 18 years with the least amount of time being 5 years. The Class of

220 Plaintiffs have suffered at the hands of the State Agency and Wekford INC and All their STAFF for over the course of those years Being released is Allowable because the SDPA statute itself has been made Invalid by the State in its effect

221 Damages are allowed under Illinois Court of claims and the court could just order the class of plaintiffs be moved

Adamczyk

S.D. Federal Court of Ill.

VII Relief Requested

222 to a facility set aside in IDOC designed for residential housing And IDOC would have to change all its policies or to Another State Agency already equipped set-up with rooms, apartments, and policies to allow free access of all rights.

223 But it would fall short of the equitable relief considering the 18 years of false imprisonment dealt with for most of us. Plaintiffs losing hope they will ever know what liberty is like anymore. Having to exist in a cruel environment (but not unusual for a criminally convicted charted person) for all those years. It would far short of being proper, and just unless in the 18 & 1595 claim relate same with it.

224 The Federal Court needs to answer All Federal Questions of law under 28§1331 And if it wants Illinois Supreme Court to elicit it requires to how to Answer themselves by asking Question of Law about SDPA Statute And its State Agencies effectively Invalidating it by Certified Questions of Law to them.

Adamczyk S.D. Federal Court of Ill.

VII Relief Requested cont.

225 Only Around 25% of Illinois State Attorney Counties have even invoked the use of the SOA mostly because they know it's an arbitrary application of law to take away a ~~the~~ person from a class of mentally ill or disability Accused persons Liberty for an indefinite Detention. The SOA statute has been in existence for over 84 years since 1935, been amended over 15 times, and only used by $\frac{1}{4}$ of the state.

226 Some of the Plaintiffs are totally innocent of any crime like myself, a large group would have gotten less than 5 years, others ~~could~~ may have gotten 30 years with a criminal trial. But at least they would have gotten a sentence with ~~the~~ for Detainee and more opportunity given within IDOC Involuntary Services Parole system. And still could yet "mandated treatment" as part of their sentence under Illinois law.

227 Saginaw County State Attorneys have put over $\frac{1}{5}$ of the Plaintiffs into IDOC even though their County is NO where the biggest in Population, but it is the County with the State government that makes laws

Advancesyle S.D. Federal Court of Ill.

VII Relief Requested

228 Since they are the State Agency whom choose by choice to become the Administrative persons in charge of the oversight of the most wards of Illinois at Bmzcc, I wrote them a letter seeing if they would represent the Plaintiff in a class action. As of yet no response at all. I wrote this letter to my County State Attorney as well as Jefferson County who for has wof's And is the County with Bmzcc is it.
No Response.

229 I filed in my committing County lawsuits against IDE and ones against certain staff as well as Jefferson County. Six different Assistant Attorney Generals of Illinois failed to follow Illinois rules of Professional Conduct for Attorneys. I notified all of them of these Rule 1-2 (d).

230 Illinois Criminal Appellate defenders refused to become my Attorney because the case is way to Unplanned for a criminal Lawyer to deal with hybrid type Law. They could not give it due diligence

Adameczk S.D. Federal Court of ILL.

III Relief Requested

231 An Appeal decision in a District Court is being written as to the Constitutional question over & of then to the Validity of the Statute on its face. The Illinois Attorney General shall have fought for a faster Decision noting it was Unconstitutional there be.

232 The Article provided notes many Illinois Lawmakers felt the SDPA should be Repealed due to its Unconstitutional issues. But that has not occurred.

233 Many times for whatever reason States hold on to Unconstitutional Statutes. Illinois is doing that with the SDPA - Federal Courts have a strong duty to Uphold the Constitution and Federal Laws for individuals the State chooses to Abuse toward them. Illinois has failed to fight for its mentally Handicapped. The Federal Court can correct that now by decided to positive punish the State Agency JDOC And Cease for its False Imprisonment Practice for its patients who are NOT to be treated as Chattel human unrehabbed property.

Respectfully yours sincerely
Laurence Adameczk

VERIFICATION

I, Lawrence Achmazyk, the undersigned, verify
and state that:

1. I am the (Petitioner) Respondent) in the above captioned legal matter.
2. I have read the foregoing application and have knowledge of its contents;
3. Under penalties of perjury as provided by law I declare that the above information is true and correct. I understand that 28 U.S.C 1915(e)(2)(A) states that the court shall dismiss this case at any time if the court determines that my allegation of poverty is untrue. I certify that the statements set forth in the foregoing motion and this Verification are true and correct except as to matters therein states to be on information and belief and as to such matters I certify and the same to be true.

s: Lawrence Achmazyk

April 27, 2022

RECEIVED

Admencyk S.D. Federal Court of Appeals

Exhibit A

JUN 22 2021

Paying it as it is part of a proceeding of recovery and/or other from the SDPA

Date:

Grievance #	14-6-21 /BNRCC	6-4-21
Grievance #	7b-5-21 /BNRCC	5-21-21
Grievance #	24-6-21 /BNRCC	6-7-21
Grievance #	15-6-21 /BNRCC	6-1-21

All went to Grievance Officer and signed off by Chief Administrative Officer

They are from specific things but stem to the problem that NOT ALL court decisions are followed at BNRCC for the WADS I do know they are WADS - A layman takes their care and handling must be very different.

NO DPE personnel come to me to try and rectify the problem - The Administration at BNRCC should have

all copies or documents with your respect
Lawrence Admencyk Thank You
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part 2 May 312021 Admencyk

ADAMCZYK S.D. Fed Court of ILL

Exhibit A

JUN 23 2021 RP

ADMINISTRATIVE
REVIEW BOARD

Dear Administrator Review Board,

I am sending 4 different Grievances based ~~on~~ all on the fact IDOC IS breaching A Statutory required duty They know exist As Already told by Court decisions. It is A GUARDIAN'S WARD Fiduciary legal duty.

Further in October of 2020 I sent a letter explaining to the hubs coordinator for IDOC the Administration at BMECC And the DO Sex offender treatment staff Are not in A required compliance of A State Law regarding the WARDS At BMECC.

In cooperation of trying to resolve issues before they go to Court who is responsible At Springfield IDOC to Alert BMECC Staff take multiple Court decision exist to Access to history, paying legal copies, legal postage, treatment and care. The warden obviously at BMECC should be up on these things.

Here are the listed Grievances which I mailed together to SFR ~~DO~~ me money (IDOC money they should be